



Spirit of the Ancients

June 20, 2021

The Honorable Tom Vilsack
Secretary of Agriculture
1400 Independence Ave. S.W.
Washington, DC 20250

Dear Secretary Vilsack:

Thank you in advance for reading the recommendation of our organization, ISPMB, the oldest wild horse and burro organization in the United States.

For the past eighteen years, ISPMB has studied four wild horse herds in our possession to gain knowledge on the best management practices for wild horses. In the past, ISPMB has given to the BLM and FS several of their programs including the Adopt-A-Horse/Burro Program. ISPMB was the instrumental force, along with our first president, Wild Horse Annie, in the passage of the Wild Horses and Burros Act of 1971.

Today, we offer a transformative management program for wild horses on public lands. We ask that the Heber Wild Horse herd residing on 300,000 acres of land in the Apache-Sitgreaves Forest be declared a study area over the next 5-7 years.

This is the ONLY herd left on public lands that has not been rounded up in over 15 years. The herd's growth rate is 0-3% over this time. This herd mimics ISPMB two herds that had growth rates of 8-9% under the best of conditions in juxtaposition to the BLM's model which shows a 20% yearly growth. According to the Agencies' model there would now be 4,800 horses on the Heber Territory. *(There are only 450.)*

This herd could transform the way the FS and BLM manages wild horses. This herd could ultimately cut the costs of management by over 50% and many other advantages as noted in the complete document attached, including restoring the health of the ecosystem. *(A Model for Managing America's Wild Horses.)*

ISPMB would be happy to meet with you and your staff and explain further the extreme importance of studying the Heber Wild Horse herd.

On the 50th year of the Act, it is fitting that wild horses are finally understood as the wildlife species they really are. That they have highly evolved social systems that help the herds to self-regulate.

The following is taken from Page 39 from the Model for Managing America's Wild Horses.

RECOMMENDATIONS

ISPMB suggests that the Heber Wild Horse Herd in Heber, Arizona be declared a study area by Secretary of Agriculture fulfilling the 1980 Academy of Sciences suggested research. The NAS's final report called for a "long-term equid research program" and an "expanded in-house scientific staff" to provide a solid foundation of scientific data on which to base management decisions. There is no doubt that this study would create a NEW model for managing wild horses.

The Heber Herd of Arizona has been intact since 2006-2007 when the court issued an order preventing the Forest Service from removing any horses until they developed a Territory Plan. At that time 300-400 horses were estimated in the Apache-Sitgreaves Forest and today there is an estimated population of 350-450 animals showing that stable populations are equivalent to stable growth. The population has been stable for more than 15 years with either a zero or 3% growth of this herd.

Why do we suggest this particular herd? **This is the ONLY herd remaining on public lands whose band structures have not been disrupted over a long period of time.** This herd shows stable growth over 15 years. This herd is similar to ISPMB's two herds that had no disruptions over a long period of time with the exception to move them to ISPMB's ranch. It is a true miracle herd and the perfect herd to be studied. This opportunity will never come again because all of the Agencies' herds have been disrupted continually destroying the family structures that are so vital to their survival.

With just a signature of the Honorable Tom Vilsack, Secretary of Agriculture, this can be done. **Section 10 of PL 92-95 (1971 Act) "The Secretaries are authorized and directed to undertake those studies of the habits of wild free-roaming horses and burros that they may deem necessary in order to carry out the provision of the Act."**

This herd must be studied as first recommended by the NAS over for the next five to seven years. The study must be contracted out to an outside source agreeable to the Forest Service and ISPMB, who sued the FS and stopped the removal of these horses in 2006-2007. In understanding the history of the program narrated on pages 5 through 10 in this document, it is understandable that the selection of a university and scientists involved should be a joint decision, especially in view of the fact of ISPMB's current knowledge on managing wild horses. Having agreed upon outside scientists, ecologists, behaviorists and habitat specialists will help to restore trust in the results of the monitoring data.

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The Heber Herd has been residing on over 300,000 acres of land in the Apache-Sitgreaves forest and has a history that dates well back into the 1800s.

Currently the Forest Service has proposed to cut the herd down to 56-110 animals (the AML carved in stone) and then inject the mares with the pesticide anti-fertility drug, PZP. This will destroy this herd which has so beautifully kept their numbers constant over all these years.

We expect that this herd could transform the management of all wild horses and burros on public lands. This herd represents what the Wild Horses and Burros Act declared for the horses *“protected from capture, branding, harassment, or death; and to accomplish this they are to be considered in the area where presently found, as an integral part of the natural system of public lands.”*

We included the above recommendation because we know how busy everyone might be with so many things to accomplish in this new administration. Our attachments take approximately one hour to read.

ISPMB is hopeful that we can have a meeting with you and your staff regarding this proposal. This truly is transformative. And on last note, ISPMB is the ONLY organization to have studied four wild herds as noted in the attached document.

We thank you in advance and look forward to hearing from you.

Most sincerely,

A handwritten signature in black ink, appearing to read "Karen Sussman". The signature is fluid and cursive, with a large loop at the end.

Karen A. Sussman
President, ISPMB